

EXHIBIT 202

From: Bryan Tyson <btyson@taylorenghish.com>
Sent: Monday, January 16, 2023 11:14 AM
To: Russ Abney; Middleton, Caroline L.
Cc: Middleton, Caroline L.; Robert McGuire; bbrown@brucepbrownlaw.com; cichter@ichterdavis.com; Jill Connors; Kaiser, Mary; Conaway, Jenna B.; hknapp@khlawfirm.com; Jessica G. Cino; sparks@khlawfirm.com; Diane LaRoss; Bryan Jacoutot; Javier Pico-Prats; cmiller@robbinsfirm.com; vrusso@robbinsfirm.com; jbelinfante@robbinsfirm.com; kaye.burwell@fultoncountyga.gov; david.lowman@fultoncountyga.gov
Subject: RE: Supplemental discovery obligations—Coffee County investigation files

External Email

Russ,

As you will recall, in October 2022, we went through a process with Judge Totenberg involving the Coffee County investigative files that included a review of all documents provided from the Secretary's investigators to the GBI. We do not have other documents that were not already produced during that process or that were withheld due to investigative privilege.

Thanks,

Bryan

Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

[Website](#) | [LinkedIn](#) | [Twitter](#)



Ask Me About Our TED Tenet of the Week: Listen to Understand.

Click [here](#) to learn more about our TED Tenets.

Alabama | California | Florida | Georgia | Illinois | Indiana | Michigan | North Carolina | Pennsylvania | Tennessee | Texas | Washington | Wisconsin

This communication (together with all attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of limitation periods unless otherwise so expressly stated.

From: Russ Abney <rabney@wattsguerra.com>
Sent: Friday, January 13, 2023 2:06 PM
To: Bryan Tyson <btyson@taylorenghish.com>; Middleton, Caroline L. <CMiddleton@mofo.com>
Cc: Bryan Tyson <btyson@taylorenghish.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Robert McGuire <ram@lawram.com>; bbrown@brucepbrownlaw.com; cichter@ichterdavis.com; Jill Connors <JConnors@ichterdavis.com>; Kaiser, Mary <MKaiser@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; hknapp@khlawfirm.com; Jessica G. Cino <cino@khlawfirm.com>; sparks@khlawfirm.com; Diane LaRoss

<dlaross@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Javier Pico-Prats <javier.picoprats@robbinsfirm.com>; cmiller@robbinsfirm.com; vrusso@robbinsfirm.com; jbelinfante@robbinsfirm.com; kaye.burwell@fultoncountyga.gov; david.lowman@fultoncountyga.gov
Subject: Supplemental discovery obligations—Coffee County investigation files

Counsel,

It is my understanding that the State's supplementation of discovery documents did not update the Coffee County investigative files. Please provide all files the State Defendants provided to the GBI with respect to the Coffee County unauthorized access to the voting system to the extent that they have not already been provided to Plaintiffs.

Please let me know when we can expect the materials.

Russell T. Abney
Watts Guerra, LLP
4 Dominion Drive, Building 3, Suite 100
San Antonio, TX 78257
(866) 457-3403

This email and any attachment was sent from the law firm Watts Guerra LLP. It may contain information that is privileged and confidential. If you suspect that you were not intended to receive it, please delete it and notify us as soon as possible. Thank you